

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT COURT OF NEW MEXICO

STATE OF NEW MEXICO <i>ex rel.</i>	)	
State Engineer, <i>et al.</i> ,	)	69cv07941-MV/KK
	)	
Plaintiffs,	)	RIO CHAMA ADJUDICATION
	)	
v.	)	Section 3, Rio Cebolla
	)	
RAMON ARAGON, <i>et al.</i> ,	)	Subfile Nos. CHCB-001-0007,
	)	CHCB-002-0001B, CHCB-002-0002C,
Defendants.	)	CHCB-002-0009
_____	)	

**CONSOLIDATED LIST OF ALL EXHIBITS TO WHICH THERE ARE OBJECTIONS**  
**IN RIO CHAMA, SECTION 3, RIO CEBOLLA SUBFILES**

**Defense Exhibits to which the State Objects:**

A.2 – The Stephen D. Hardin Map.  
A.3 – Township Map.  
A.4 – Dills Map.  
B.1 – Excerpt from Malcolm Ebright Report.  
B.2 – Cebolla Vegetation Comparison.  
C.1 – Aerial Photograph.  
C.2 – CHCB 001-0007 Subfile Maps.  
D.1 – About 200 Photographs of Claimed Irrigated Acreage.  
D.2 – Video of Old Valdez Ditch Running Down to Alfalfita Field (marked as D.3).  
E.1 – Deeds.  
E.2 – Statement of Old Water Rights.  
E.3 – Venceslao Martinez Ditch Declaration.  
F.1.a) through F.1.d) – Depositions.  
F.2.a) – “History” by Charlie Chacon and Attached Affidavits.  
F.2.b) – Affidavits.  
F.3 through F.9 – Homestead Documents.

F.10 – Letters from H.J. Guthmann and Medardo Sanchez.

F.11 – Letter to State Engineer from Jose I. Maes, dated April 12, 1972 irrigation on the Pinabetal.

Unmarked Exhibit – Receipts from the U.S. National Archives & Records Administration.

**State Exhibits to which the Defendants Object:**

1. Dr. John O Baxter, Curriculum Vitae.
2. Dr. John O. Baxter, *Settlement and Irrigation on the Rio Cebolla*, July 2014.
3. Dr. John O. Baxter, *Report Concerning the Old Valdez Ditch and the Alfalfita Ditch*, May 2014.
4. Dr. John O. Baxter, Memorandum to Misty Braswell, Esq., November 18, 2013.
15. Rio Cebolla Hydrographic Survey Report, August 11, 2000, Appendix B, Abstracts of Surface Water Rights Declaration, pages B-4 to B-8 (OSE Nos. 0636, 0636-B, 0636-c.
31. Rio Chama Hydrographic Survey, Rio Cebolla, Original Map Sheet CHCB-1, August 11, 2000.
32. Rio Chama Hydrographic Survey, Rio Cebolla, Original Map Sheet CHCB-2, August 11, 2000.
33. Rio Chama Hydrographic Survey, Rio Cebolla, Original Map, August 11, 2000; Findings of the Hydrographic Survey Subfiles CHCB-001-0007, CHCB-002-0001, CHCB-002-0002, CHCB-002-0009.
34. Subfile map showing State's proposed mapping of water rights under subfile CHCB-001-0007 (Geralda and Charlie Chacon).
35. Subfile map showing State's proposed mapping of water rights under subfile CHCB-002-0007 (Geralda and Charlie Chacon).
36. Subfile map showing State's proposed mapping of water rights under subfile CHCB-002-0002C (Delfin O. and Francis S. Quintana Trust).
37. Subfile map showing State's proposed mapping of water rights under subfile CHCB-002-0009 (Geralda and Charlie Chacon).
48. Map showing adjudicated water rights and disputed claims under Acequia del Pinavetal, Old Valdez Ditch, Alfalfita Ditch and Chacon Ditch.
50. Report of Recheck, dated April 26, 2001, CHCB-002-0001, including 11 photographs and copies of 2 Polaroid photos taken on April 23, 2001.

- 51. Report of Recheck, dated October 31, 2002, CHCB-002-0009, CHCB-001-0007 including 8 photographs, Addendum to Report of Recheck, dated November 4, 2002.
- 52. 1 photograph taken May 5, 2011, and 23 photographs taken April 2, 2014.
- 58. Expert Witness Report of James Aguirre dated March 16, 2015.

Respectfully submitted,

/s/ Felicity Strachan

Felicity Strachan

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**Certificate of Service**

I certify that on October 26, 2016, I filed the foregoing electronically through the CM/ECF system which caused the parties on the electronic service list, as more fully set forth in the Notice of Electronic Filing, to be served via electronic mail.

/s/ Felicity Strachan

Felicity Strachan